

Richard M. Cieri
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022-4611
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Ray C. Schrock (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 861-2000
Facsimile: (312) 861-2200

Mark E. McKane (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
555 California Street, 27th Floor
San Francisco, CA 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500

Attorneys for the Creditor
NEW UNITED MOTOR MANUFACTURING, INC.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.***

Debtors.

Chapter 11 Case No.: 09-50026 (REG)

(Jointly Administered)

**DECLARATION OF MARK E.
McKANE IN SUPPORT OF INITIAL
RESPONSE TO THE DEBTORS'
OBJECTION TO PROOF OF CLAIM
67357 FILED BY NEW UNITED
MOTOR MANUFACTURING, INC.**

I, Mark E. McKane, hereby declare as follows:

1. I am a partner at Kirkland & Ellis LLP, attorneys for Claimant New United Motor Manufacturing, Inc. I am licensed in the State of California, the State of Illinois, and the District of Columbia and am duly admitted to practice before this Court. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief, and, as to those, I am informed

and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

2. Attached hereto as Exhibit A is a true and correct copy of a February 12, 1982 article in the *New York Times* titled "G.M. Shutdowns To Lay Off 26,200."

3. Attached hereto as Exhibit B is a true and correct copy of a September 25, 1982 article in the *New York Times* titled "Retraining Accord Reached On Coast."

4. Attached hereto as Exhibit C is a true and correct copy of a November 14, 1982 article in the *New York Times* titled "General Motors: A Giant In Transition."

5. Attached hereto as Exhibit D is a true and correct copy of an April 30, 1990 article in the *San Jose Mercury News* titled "GM's Hard Lessons."

6. Attached hereto as Exhibit E is a true and correct copy of an article in the *Automotive News* (Vol. 71, No. 5763, April 27, 1998) titled "NUMMI Stint Helps Hogan Think Small."

7. Attached hereto as Exhibit F is a true and correct copy of a September 3, 1999 article in the *San Jose Mercury News* titled "NUMMI Now and Next: Analysts Predict Sport-Utility Or Hybrid Wagon Might Be Future Product At Fremont Plant."

8. Attached hereto as Exhibit G is a true and correct copy of an August 1, 2001 article in the *Detroit Free Press* titled "GM Executive Gives Toyota Credit For Improving Detroit Firm's Quality."

9. Attached hereto as Exhibit H is a true and correct copy of an April 6, 2004 article in the *Tri-Valley Herald* titled "GM, Toyota Maintaining Success."

10. Attached hereto as Exhibit I is a true and correct copy of an article in the *California Management Review* (Vol. 47, No. 4, Summer 2005) by Andrew C. Inkpen titled "Learning Through Alliances: General Motors and NUMMI."

11. Attached hereto as Exhibit J is a true and correct copy of a June 19, 2009 article in the *Grand Rapids Press* titled “GM Kills Vibe Brand: Automaker Will Quit Making Hatchback In August.”

12. Attached hereto as Exhibit K is a true and correct copy of a June 29, 2009 Associated Press article titled “GM Ends Joint Venture With Toyota At Calif. Plant.”

I hereby swear that the foregoing is true and correct.

May 24, 2010
San Francisco, California

/s/ *Mark E. McKane*
Mark E. McKane